

# EXHIBIT C

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN RE: DMCA SECTION 512(h) )  
SUBPOENAS TO GODADDY.COM, ) MISC. ACTION NO. \_\_\_\_\_  
LLC AND CLOUDFLARE, INC. )

---

**DECLARATION OF KAREN ANAPOELL IN SUPPORT OF  
PETITIONER'S REQUEST TO THE CLERK FOR ISSUANCE OF  
SUBPOENAS TO GODADDY AND CLOUDFLARE PURSUANT TO  
17 U.S.C. § 512(h) TO IDENTIFY ALLEGED INFRINGER(S)**

I, Karen Anapoell, under penalty of perjury pursuant to the laws of the United States of America, hereby declare as follows:

1. I am General Counsel at Innovation Refunds LLC (“Innovation Refunds”) and am authorized to act on its behalf. As part of my duties, I am responsible for monitoring and addressing infringement of copyrights owned by Innovation Refunds. I have personal knowledge of the facts contained herein and, if called upon to do so, I could and would testify competently thereto.

2. I submit this declaration in support of Innovation Refunds’ request for issuance of subpoenas to GoDaddy.com, LLC (“GoDaddy”) and Cloudflare, Inc. (“Cloudflare”) pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h) (the “DMCA Subpoena”). The purpose of Innovation Refunds’ DMCA Subpoena is to identify the alleged infringer or infringers who copied and

posted Innovation Refunds' website on ercusa.biz (the "Domain"), which is registered with GoDaddy and hosted by Cloudflare. The Domain copied Innovation Refunds' website, including, but not limited to, its text, images, and color scheme, all of which are protected by copyright laws. The copying and posting of Innovation Refunds' website infringes copyrights held by Innovation Refunds in those materials (the "Infringing Content").

3. The purpose for which Innovation Refunds' DMCA Subpoenas is sought is to obtain the identity of the alleged infringer or infringers, and such information will only be used for the purpose of protecting Innovation Refunds' rights under title 17 U.S.C. §§ 100, *et seq.*

As an authorized agent for Innovation Refunds LLC, I hereby certify, pursuant to 28 U.S.C. §1746, and under penalty of perjury, that the foregoing declaration is true and correct to the best of my knowledge.

4/18/2023

Date

DocuSigned by:  
*Karen Anapoell*  
8183137C891944E...

Karen Anapoell  
Innovation Refunds LLC